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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALBERT BROWN, an individual; and ARSEMA
HAGOS,

Plaintiffs,

vs.

THE STATE OF NEVADA EX REL. NEVADA
STATE POLICE HIGHWAY PATROL; officer
DANIEL S. MAREK, in his individual capacity,

Defendants.

Case No. 2:24-cv-01994-BNW

**STIPULATION AND ORDER
TO EXTEND TIME FOR
DEFENDANTS' TO RESPOND
TO COMPLAINT
(FIRST REQUEST)**

Plaintiffs ALBERT BROWN and ARSEMA HAGOS ("Plaintiffs"), by and through counsel, TAYLOR N. JORGENSEN, ESQ., and Defendants STATE OF NEVADA EX REL. NEVADA STATE POLICE HIGHWAY PATROL and DANIEL S. MAREK ("Defendants"), by and through counsel, AARON D. FORD, Nevada Attorney General, and JARED M. FROST, Senior Deputy Attorney General, hereby stipulate and agree to extend the time for Defendants to file a response to Plaintiffs' Complaint (ECF No. 1-2) for an additional fifty-eight (58) days as calculated from October 30, 2024. Plaintiff made service attempts on Defendants State of Nevada and Daniel Marek on September 27, 2024, and Defendants removed this action to federal court on October 23, 2024. Defendants request a new response deadline of December 27, 2024.

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This request is submitted pursuant to Local Rules IA 6-1 and 6-2 and is Defendants' first request for an extension of time to respond to the Complaint. Good causes exist for this extension. Defendants' counsel needs additional time to consult with Defendants to prepare and complete a response to the Complaint. The parties also need additional time to address any outstanding service defects and to explore the possibility of early resolution through negotiation. This Stipulation is sought in good faith and not for undue delay.

DATED this November 7, 2024.

LARGOMARSINO LAW

By: /s/ Taylor N. Jorgensen

Taylor N. Jorgensen, Esq., SBN 16259
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Attorneys for Plaintiffs

DATED this November 7, 2024.

AARON D. FORD
Nevada Attorney General

By: /s/ Jared M. Frost

Jared M. Frost, SBN 11132
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Las Vegas, NV 89119

Attorneys for Defendants

ORDER

IT IS SO ORDERED. Defendants shall file their response to the Complaint on or before December 27, 2024.

DATED: November 8, 2024


UNITED STATES MAGISTRATE JUDGE